

**MRP Properties Company, LLC**

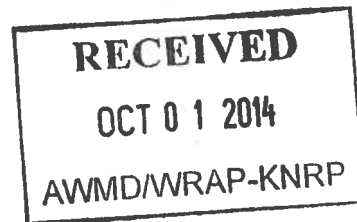
Post Office Box 696000 • San Antonio, Texas 78269-6000 • Telephone (210) 345-2000

Brenda B. Epperson  
Manager

Environmental Liability & Remediation Management

September 30, 2014

Mark Vishnefske  
Environmental Scientist II  
Hazardous Waste Corrective Actions  
Kansas Department of Health and Environment  
1000 SW Jackson, Suite 320  
Topeka, Kansas 66612-1366



**Via Electronic Mail**

Mark.Vishnefske@kdheks.gov

**Re: Part II Permit Groundwater Monitoring Plan**

**MRP Properties Company, LLC – Arkansas City, Kansas  
EPA ID No. KSD087418695**

Dear Mr. Vishnefske,

The purpose of this letter is to request a revision to the groundwater monitoring plan for the Part II Permit monitor wells. The current groundwater monitoring plan for the Part II Permit wells is contained in the Addendum #1 to the RCRA Permit Part B Renewal Application Appendix P (Monitoring Plan). The Part II wells were sampled in October 2013 and May 2014 according to the Monitoring Plan. The groundwater samples were analyzed for the Part I Permit Groundwater Protection Standards (GWPS) list of constituents contained in Attachment B of the Permit. The results of the two groundwater sampling events were presented in the 2013 Annual Groundwater Monitoring Report and the 2014 Semiannual Groundwater Monitoring Report for the October 2013 and May 2014 sampling events, respectively.

In discussions between yourself and Jay Mednick of MWH we understand that KDHE prefers to see a consistent sitewide approach to the groundwater monitoring at the Arkansas City site. We agree with this approach and have developed a monitoring plan to achieve this objective. The monitoring plan proposed herein is designed to mesh with the current Part I Permit groundwater monitoring plan. The Part I groundwater monitoring plan consists of three elements, 1) semiannual sampling and testing for benzene, toluene, ethylbenzene, and xylenes (BTEX); 2) every three years sampling and testing for the GWPS constituents; and 3) every 5 years sampling and testing for Appendix IX constituents in three select wells as described in the Part I Permit.

The proposed Part II monitoring plan is based on the results of the two above referenced previous groundwater monitoring events and data from previous monitoring events since 1998. The proposed plan includes three elements, 1) semiannual sampling at 25 monitor wells and testing for the Attachment B volatile organic compounds (VOCs) and naphthalene; 2) every 18-months sampling 46 monitor wells for VOCs and naphthalene; and 3) every three years sampling 46 wells and testing for the GWPS

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constituents. The attached Table 1 lists the Part I and Part II monitoring wells, sampling frequency, and constituents to be tested. The attached Figure 1 shows the Part I and Part II monitor well locations with the sampling frequency indicated by the color coded well label caption. The proposed monitoring frequency for the Part I and Part II wells through 2024 is summarized on Table 2. For consistency we also propose expanding the Part I semiannual sampling BTEX constituent list to the same constituents proposed for the Part II semiannual sampling (VOCs and naphthalene).

The groundwater sampling will be conducted according to the methods and procedures described in the approved monitoring plan and the quality assurance project plan.

We would like to implement this monitoring plan in the upcoming sampling event currently scheduled to start on October 20, 2014. If you have any questions regarding this request please contact me at 210/345-4619 or Jay Mednick at 303/291-2262. We are available to discuss this proposed plan at your convenience.

Sincerely,



Brenda B. Epperson

cc: Brad Roberts, EPA Region VII – AWMD/WRAP  
Kent Biggerstaff – MRP Properties Company, LLC – Arkansas City  
Jay Mednick – MWH

**Table 1 Part I and Part II Permit Groundwater Monitoring Well Network, Analytical Testing, and Monitoring Frequency  
MRP Properties Company, LLC - Arkansas City, KS**

	Well ID	Semiannual (VOCs)	18 Month (VOCs)	Triennial (GWPS)
Part I	WN-1A	•		•
	WN-1B	•		•
	WN-5B	•		•
	WN-6A	•		•
	WN-6B	•		•
	WN-7B	•		•
	WN-8B	•		•
	MW-6	•		•
	MW-12	•		•
	MW-13	•		•
	MW-17	•		•
	RCRA-4	•		•
Part II	RFI2-1A		•	•
	RFI2-1C	•		•
	RFI2-2A		•	•
	RFI2-2C	•		•
	RFI2-3A		•	•
	RFI2-3C	•		•
	RFI2-4A		•	•
	RFI2-4B		•	•
	RFI2-4C	•		•
	RFI2-7A		•	•
	RFI2-7C		•	•
	RFI2-8A		•	•
	RFI2-8C		•	•
	RFI2-9C		•	•
	RFI2-10C		•	•
	RFI2-11C		•	•
	RFI2-12C	•		•

	Well ID	Semiannual (VOCs)	18 Month (VOCs)	Triennial (GWPS)
Part II	RFI2-13C		•	•
	RFI2-14C		•	•
	MW-9		•	•
	MW-14		•	•
	MW-20C		•	•
	MW-21C		•	•
	MW-22C	•		•
	MW-23C	•		•
	MW-24C	•		•
	MW-25C	•		•
	MW-26C	•		•
	MW-27A		•	•
	MW-27C	•		•
	MW-28C	•		•
	MW-29C	•		•
	MW-30C	•		•
	MW-31C	•		•
	MW-32C		•	•
	MW-33C	•		•
	MW-34C	•		•
	MW-35C	•		•
	MW-36C	•		•
	MW-37C	•		•
	MW-38C	•		•
	MW-39C	•		•
	MW-40C		•	•
	MW-41C	•		•
	MW-42C	•		•
	MW-43C	•		•

Notes:

VOCs - volatile organic compounds and naphthalene

GWPS - groundwater protection standard constituent list, Part I Permit Attachment B

Table 2 Part I and Part II Permit Combined Sampling and Analytical Testing Schedule  
MRP Properties Company, LLC - Arkansas City, KS

	2013	2014		2015		2016		2017		2018		2019		2020		2021		2022		2023		2024	
Month	October	May	October	May	October	May	October	May	October	May	October	May	October	May	October	May	October	May	October	May	October	May	October
Well List	Triennial	Triennial	SA	18 Month	SA	SA	Triennial	SA	SA	18 Month	SA	SA	Triennial	SA	SA	18 Month	SA	SA	Triennial	SA	SA	18 Month	SA
Analyses																							
Part I	GWPS	VOCs	VOCs	VOCs	VOCs	VOCs	GWPS	VOCs	VOCs	VOCs	VOCs	VOCs	GWPS	VOCs	VOCs	VOCs	VOCs	VOCs	GWPS	VOCs	VOCs	VOCs	VOCs
Part II	GWPS	GWPS	VOCs	VOCs	VOCs	VOCs	GWPS	VOCs	VOCs	VOCs	VOCs	VOCs	GWPS	VOCs	VOCs	VOCs	VOCs	VOCs	GWPS	VOCs	VOCs	VOCs	VOCs

Notes:  
The October 2013 and May 2014 sampling events have been completed  
Well List - refer to Table 1 for well list  
Triennial - every three years  
SA - semiannual, every six months  
18-month - every 18 months  
GWPS - Part I Permit Attachment B groundwater protection standard constituent list  
VOCs - volatile organic compounds, Part I Permit Attachment B groundwater protection standard VOC constituent list & naphthalene; using SW-846 Method 8260B





## EXPLANATION

### PERMIT PART I MONITOR WELLS

- ▲ SHALLOW ALLUVIAL MONITOR WELL  
SCREENED ACROSS WATER TABLE
- ▼ DEEP ALLUVIAL MONITOR WELL
- CAPTURE ZONE MONITOR WELL

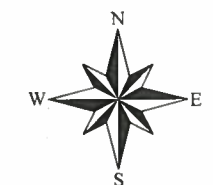
### PERMIT PART II MONITOR WELLS

- ▲ SHALLOW ALLUVIAL MONITOR WELL
- DEEP ALLUVIAL MONITOR WELL

### CORRECTIVE ACTION RECOVERY WELLS

- PERMIT PART I RECOVERY WELL
- PERMIT PART II RECOVERY WELL
- DIRECTION OF SURFACE WATER FLOW
- FACILITY PROPERTY BOUNDARY

- MW-12 SEMIANNUAL SAMPLING FREQUENCY
- MW-9 18-MONTH SAMPLING FREQUENCY



SCALE IN FEET



AERIAL PHOTO:  
MARCH 12, 2005

REVISION	DATE	DESIGN BY	DRAWN BY	REVIEWED BY
A	9/2/2014	CCL	CCL	JFM

TITLE:

## SITE-WIDE GROUNDWATER MONITORING WELL NETWORK

PROJECT:

**MRP PROPERTIES COMPANY, LLC**  
**ARKANSAS CITY, KANSAS**



Figure No.:

1